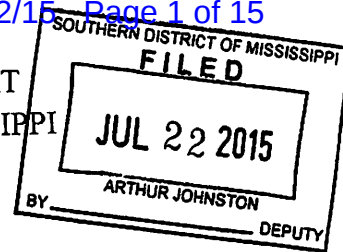


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. *1:15cr55-LG-RHW*

ANN LOUISE FRANZEN,
GARY MELVIN BARNARD,
SHAWN ANN WHITE,
TANYA LYNN THOMAS,
MICHELE GAYLE FEE,
ANTHONY SHANE JEFFERS, and
FUNSO HASSAN

18 U.S.C. § 1349
18 U.S.C. § 371
18 U.S.C. § 1341
18 U.S.C. § 1343
18 U.S.C. § 1956(h)

The Grand Jury charges:

At all times relevant to this indictment

1. A.B. was a resident of Harrison County in the Southern Division of the Southern District of Mississippi.
2. M.D. was a resident of Jackson County in the Southern Division of the Southern District of Mississippi.
3. L.B. was a resident of Jackson County in the Southern Division of the Southern District of Mississippi.
4. G.O. was a resident of Harrison County in the Southern Division of the Southern District of Mississippi.
5. H.A. was a resident of Harrison County in the Southern Division of the Southern District of Mississippi.
6. S.E.W. was a resident of Jackson County in the Southern Division of the Southern District of Mississippi.

7. J.S. was a resident of George County in the Southern Division of the Southern District of Mississippi.
8. M.B. was a resident of Stone County in the Southern Division of the Southern District of Mississippi.
9. R.H. was a resident of Hancock County in the Southern Division of the Southern District of Mississippi.
10. A.E. was a resident of Harrison County in the Southern Division of the Southern District of Mississippi.
11. K.F. was a resident of the Southern District of Mississippi
12. Defendant **ANN LOUISE FRANZEN** was a resident of Hancock County in the Southern Division of the Southern District of Mississippi.
13. Defendant **GARY MELVIN BARNARD** was a resident of Manteca, California.
14. Defendant **SHAWN ANN WHITE** was a resident of Manteca, California.
15. Defendant **TANYA LYNN THOMAS** was a resident of Reno, Nevada and Turlock, California.
16. Defendant **MICHELE GAYLE FEE** was a resident of Manteca, California.
17. Defendant **ANTHONY SHANE JEFFERS** was a resident of Maryville, Tennessee.
18. Defendant **FUNSO HASSAN** was a resident of Nigeria.
19. During the time of the conspiracy, email account **BOWENCONSULT@GMAIL.COM** was used by defendant **FUNSO HASSAN**.
20. During the time of the conspiracy, email account **MARK.WAYNE@AOL.COM** was used by defendant **FUNSO HASSAN**.
21. During the time of the conspiracy, email account **MICHELLEMICELLEHENK@YAHOO.COM** was used by defendant **FUNSO HASSAN**.

22. During the time of the conspiracy, email account CHUCKSANNIE@YAHOO.COM was used by defendant **ANN LOUISE FRANZEN**.
23. During the time of the conspiracy, email account ANNLOUISE46@YAHOO.COM was used by defendant **ANN LOUISE FRANZEN**.
24. During the time of the conspiracy, email account AFRANZEN46@YAHOO.COM was used by defendant **ANN LOUISE FRANZEN**.
25. During the time of the conspiracy, email account NY13ARTMAN@YAHOO.COM was used by an unknown co-conspirator.
26. During the time of the conspiracy, email account DANIEL.DUNN62@AOL.COM was used by an unknown co-conspirator.
27. During the time of the conspiracy, email account EMMANUEL.ALEX34@GMAIL.COM was used by an unknown co-conspirator.
28. During the time of the conspiracy, email account BARRAGREENFIELD@YAHOO.COM was used by an unknown co-conspirator.
29. During the time of the conspiracy, email account PAJOB@AOL.COM was used by an unknown co-conspirator.
30. During the time of the conspiracy, email account ADAMCHESNOFF@AOL.COM was used by an unknown co-conspirator.
31. During the time of the conspiracy, email account NASOND62@GMAIL.COM was used by an unknown co-conspirator.
32. During the time of the conspiracy, email account MARKANDERSON684@GMAIL.COM was used by an unknown co-conspirator.
33. During the time of the conspiracy, email account AJPCTECH71@YAHOO.COM was used by defendant **ANTHONY SHANE JEFFERS**.
34. During the time of the conspiracy, email account BARNARDG09@YAHOO.COM was

used by defendants **GARY MELVIN BARNARD** and **SHAWN ANN WHITE**.

35. During the time of the conspiracy, email account **SHEWOLF6314@YAHOO.COM** was used by defendant **TANYA LYNN THOMAS**.

36. During the time of the conspiracy, email account **DAVIDWIRICK_TEXTILES@YAHOO.COM** was used by an unknown co-conspirator.

COUNT 1

Paragraphs 1 through 36 of this indictment are re-alleged and incorporated by reference as if fully set forth herein.

37. Beginning on or about August 13, 2011, and continuing through June 3, 2015, in Harrison County, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants, **ANN LOUISE FRANZEN, GARY MELVIN BARNARD, SHAWN ANN WHITE, TANYA LYNN THOMAS, MICHELE GAYLE FEE, ANTHONY SHANE JEFFERS and FUNSO HASSAN**, did knowingly and willfully conspire with each other and with others known and unknown to the grand jury, to violate the following sections of the United States Code:

38. a. Section 1341, Title 18, United States Code, that is, having devised and intended to devise a scheme and artifice to defraud and to obtain money or property by means of false and fraudulent pretenses and representations, and promises, and for the purpose of executing and attempting to execute such scheme and artifice, knowingly and unlawfully caused to be delivered by the United States Postal Service and private and interstate commercial carriers matters according to the directions thereon;

b. Section 1343, Title 18, United States Code, that is, having devised or intended to devise a scheme and artifice to defraud and to obtain money and property by means of false and fraudulent pretenses and representations, and promises, transmitted or caused to be transmitted in interstate and foreign commerce certain wire communications for the purpose

of executing the scheme or artifice;

c. Section 1344, Title 18, United States Code, that is, to knowingly execute or attempt to execute a scheme and artifice to obtain funds under the custody and control of financial institutions by means of false and fraudulent pretenses and representations.

39. It was the object of the conspiracy for the defendants, **ANN LOUISE FRANZEN, GARY MELVIN BARNARD, SHAWN ANN WHITE, TANYA LYNN THOMAS, MICHELE GAYLE FEE, ANTHONY SHANE JEFFERS and FUNSO HASSAN**, and others, to unlawfully enrich themselves by conducting multiple complex financial fraud schemes via the internet, U.S. mail and various express package delivery services. The various fraud schemes included work at home scams; secret shopper scams; fraudulent check scams and fraudulent credit card account purchases. The proceeds of these scams, both checks and goods, were shipped to various locations in the United States and to Nigeria through a complex re-shipping network of both complicit and unwitting individuals recruited through the various internet scams. The monetary proceeds were sent to persons in multiple international locations including the United States, Nigeria, United Arab Emirates, China, Ghana, Haiti, Philippines, and South Africa via international money transfer services such as Western Union and MoneyGram.

40. The object of the conspiracy was to be accomplished by the following manner and means:

41. It was a part of the conspiracy that the defendant, **FUNSO HASSAN**, and others, would seek out and identify potential victims through online work at home opportunities. Mass e-mailings were used to solicit victims through the work at home scams.

42. It was a part of the conspiracy that the defendants, **ANN LOUISE FRANZEN, GARY MELVIN BARNARD, SHAWN ANN WHITE, TANYA LYNN THOMAS, MICHELE GAYLE FEE, ANTHONY SHANE JEFFERS and FUNSO HASSAN**, would receive and ship via U.S. Mail and express package delivery services, hundreds of counterfeit checks and money

orders, in amounts totaling millions of dollars.

43. It was a part of the conspiracy that the defendants, **ANN LOUISE FRANZEN, GARY MELVIN BARNARD, SHAWN ANN WHITE, TANYA LYNN THOMAS, MICHELE GAYLE FEE, ANTHONY SHANE JEFFERS and FUNSO HASSAN**, conducted what is known as an advanced check fraud scheme, in that they would enlist and use both witting and unwitting persons to deposit fraudulent/counterfeit checks and money orders in United States federally insured banks. Defendants would then cause funds within the custody and control of the banks to be withdrawn prior to the bank knowing said checks were fraudulent. The recipient would keep a small amount of the funds then forward the fraudulently obtained funds via wire transfer to others.

44. It was part of the conspiracy that the defendants, **ANN LOUISE FRANZEN and ANTHONY SHANE JEFFERS**, would design and manufacture counterfeit checks for distribution to victims throughout the United States.

43. It was a part of the conspiracy that the defendants, **ANN LOUISE FRANZEN, GARY MELVIN BARNARD, SHAWN ANN WHITE, TANYA LYNN THOMAS, MICHELE GAYLE FEE, ANTHONY SHANE JEFFERS and FUNSO HASSAN**, and others used fraudulently purchased and/or counterfeit USPS shipping labels to send the counterfeit checks to the recipients.

45. It was part of the conspiracy that the defendants **ANN LOUISE FRANZEN, GARY MELVIN BARNARD, SHAWN ANN WHITE, TANYA LYNN THOMAS, MICHELE GAYLE FEE, ANTHONY SHANE JEFFERS and FUNSO HASSAN**, and others would receive and send wire transfers of fraudulently obtained funds.

46. In order to accomplish the object of the conspiracy, the defendants, **ANN LOUISE FRANZEN, GARY MELVIN BARNARD, SHAWN ANN WHITE, TANYA LYNN THOMAS, MICHELE GAYLE FEE, ANTHONY SHANE JEFFERS and FUNSO HASSAN**, and their co-conspirators committed the following acts in furtherance of the conspiracy, including

but not limited to:

48. On or about November 14, 2012, Customs Border Patrol (CBP) agents intercepted a package sent to the address of defendant **FRANZEN** in Kiln, Mississippi, which was addressed to Bowen Consult by an unknown co-conspirator and contained three hundred twenty-six (326) counterfeit checks totaling \$1,621,850.00.

49. On or about November 19, 2012, agents seized from the residence of defendant **FRANZEN** in Kiln, Mississippi, 671 counterfeit checks and 646 counterfeit U.S. Postal money orders sent to **FRANZEN** by a person known as "Mark Wayne" residing in Nigeria who utilized the email addresses **BOWENCONSULT@GMAIL.COM** and **MARK.WAYNE@AOL.COM**.

50. On April 10, 2013, defendant **BARNARD** sent an email to **DAVIDWIRICK_TEXTILES@YAHOO.COM** with photographs and descriptions of defendants **BARNARD, WHITE and FEE**, for the purpose of obtaining counterfeit identification documents.

51. On April 26, 2013, defendant **THOMAS** sent an email to **DAVIDWIRICK_TEXTILES@YAHOO.COM** confirming receipt of a package containing 405 counterfeit checks and 387 counterfeit money orders totaling \$1,128,742.20.

52. On May 14, 2013, CBP intercepted a DHL international mail parcel addressed to defendant **WHITE** in Manteca, California containing counterfeit U.S. Postal money orders in the sum of \$763,425.00.

53. On February 12, 2013, defendant **BARNARD** mailed a counterfeit check to victim L.B.

54. On April 17, 2013, defendant **BARNARD** mailed a counterfeit check to victim A.B.

55. On April 17, 2013, defendant **BARNARD** mailed a counterfeit check to victim M.D.

56. On October 28, 2012, defendant **THOMAS** mailed a counterfeit check to victim

S.E.W.

57. On November 12, 2012, defendant **THOMAS** mailed a counterfeit check to victim

G.O.

58. On December 21, 2012, defendant **THOMAS** mailed a counterfeit check to victim

J.S.

59. On April 12, 2013, defendant **THOMAS** mailed a counterfeit check to victim H.A.

60. On February 2, 2013, defendant **JEFFERS** mailed a counterfeit check to victim

M.B.

61. On February 2, 2013, defendant **JEFFERS** mailed a counterfeit check to victim A.E.

62. On February 25, 2013, defendant **JEFFERS** mailed a counterfeit check to victim

R.H.

63. On February 25, 2013, defendant **JEFFERS** mailed a counterfeit check to victim

K.F.

64. Between March 17, 2013 and October 26, 2013, defendant **FEE** sent and/or received by wire transfer \$25,977.01 via Western Union. **FEE** used a counterfeit ID in the name of Mary James to conduct some of the transactions.

65. Between March 19, 2013 and August 8, 2013, defendant **FEE** sent and/or received by wire transfer \$29,179.30 via MoneyGram. **FEE** used a counterfeit ID in the name of Mary James to conduct some of the transactions.

66. On October 25, 2013, CBP agents seized an international United Parcel Service package from Nigeria addressed to defendant **FEE** containing six (6) counterfeit identification documents.

67. On April 16, 2013, defendant **BARNARD** received an email from DAVIDWIRICK_TEXTILES@YAHOO.COM providing the USPS tracking number for a parcel mailed to defendant **FEE** containing 550 checks.

68. On June 26, 2013, defendant **BARNARD** received an email from

DAVIDWIRICK_TEXTILES@YAHOO.COM providing the DHL tracking number for a parcel sent to defendant **FEE**.

69. Between January 1, 2012 and December 2, 2013, defendant **WHITE** sent and/or received by wire transfer \$52,893.90 via MoneyGram.

70. Between April 17, 2013 and October 26, 2013, defendant **WHITE** sent and/or received by wire transfer \$12,232.05 via Western Union.

71. On September 17, 2013, CBP agents intercepted a DHL international mail parcel addressed to defendant **WHITE** in Manteca, California containing counterfeit U.S. Postal money orders in the sum of \$330,055.00.

72. On December 3, 2013, agents seized from the residence of defendants **BARNARD** and **WHITE** 387 counterfeit checks totaling \$1,148,260.00; 681 counterfeit U.S. Postal money orders totaling \$654,147.00; 218 counterfeit traveler's checks totaling \$109,000.00; and a counterfeit Wisconsin driver's license used by defendant **WHITE** to send and receive money by wire transfer.

73. Between January 4, 2012 and October 22, 2013, defendant **BARNARD** sent and/or received by wire transfer \$137,188.47 via MoneyGram.

74. Between April 17, 2012 and October 27, 2013, defendant **BARNARD** sent and/or received by wire transfer \$32,039.85 via Western Union.

75. On May 30, 2012, defendant **HASSAN** sent an email to defendant **FRANZEN** with an attachment containing seven (7) USPS priority shipping labels.

76. On December 18, 2012, defendant **HASSAN** sent an email to defendant **JEFFERS** with attachments containing 183 USPS priority mail shipping labels.

77. On April 12, 2012, defendant **FRANZEN** and defendant **HASSAN** exchanged emails in which they discussed the movement of money via Western Union.

78. On April 15, 2012, defendant **FRANZEN** and defendant **HASSAN** exchanged

emails in which they discussed the movement of money via Western Union and money spent by **FRANZEN** for the purchase of supplies to print counterfeit checks and money orders.

79. On February 1, 2013, defendant **HASSAN** sent an email to defendant **JEFFERS** with attachments containing 85 USPS shipping labels.

80. On March 23, 2012, defendant **FRANZEN** sent an email to defendant **HASSAN** requesting he retype the instructions for the mystery shopper jobs sent in a prior email.

All in violation of Sections 1349 and 2, Title 18, United States Code.

COUNT 2

81. That from on or about August 13, 2011, and continuing through June 3, 2015, in Harrison County in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendants, **ANN LOUISE FRANZEN, GARY MELVIN BARNARD, SHAWN ANN WHITE, TANYA LYNN THOMAS, MICHELE GAYLE FEE, ANTHONY SHANE JEFFERS and FUNSO HASSAN**, did knowing and willfully conspire with each other and with others known and unknown to the Grand Jury, to commit offenses against the United States as follows:

82. a. Identity Theft as prohibited by Section 1028(a)(7), Title 18, United States Code, that is the possession, transfer and use in or affecting interstate or foreign commerce, without lawful authority, the means of identification of another person with the intent to commit, or to aid or abet or in connection with unlawful activities that constitute violations of Federal law, or that constitute felonies under State or local law;

b. Theft of government funds as prohibited by Section 641, Title 18, United States Code in that to embezzle, steal, purloin and knowingly convert to their own use or the use of another, in excess of \$1000.00 in money or thing of value of the United States of America and the United States Postal Service (hereinafter U.S.P.S.), a department or agency of the United States of America.

83. In furtherance of the conspiracy and to carry out its objectives, the overt acts in paragraphs 1 through 80 are re-alleged and incorporated as if set forth herein.

All in violation of Sections 371 and 2, Title, 18 United States Code.

COUNTS 3-12

84. In furtherance of the scheme and artifice to defraud and to carry out its objectives, the allegations in paragraphs 1-80 are re-alleged and incorporated as if set forth herein.

85. That on or about the dates listed below, in Harrison County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendants, **GARY MELVIN BARNARD, TANYA LYNN THOMAS, and ANTHONY SHANE JEFFERS**, aided and abetted by each other and others known and unknown to the grand jury, did knowingly devise and intend to devise a scheme and artifice to defraud and to obtain money or property by means of false and fraudulent pretenses and representations, and for the purpose of executing and attempting to execute the scheme, knowingly and unlawfully causing to be delivered by the United States Postal Service and private and commercial interstate and foreign carriers matters, including but not limited to false, fraudulent and counterfeit checks, according to the directions thereon, on or about the dates set forth below, by the United States Postal Service, to the persons/entities whose names and cities of residence are listed below, each constituting a separate count:

Count	Date	From	To	Track #
3	10/28/2012	Thomas	S.E.W. Ocean Springs, MS	7465-26
4	11/12/2012	Thomas	G.O. Gulfport, MS	4134-44
5	12/21/2012	Thomas	J.S. Lucedale, MS	2656-44
6	4/12/2012	Thomas	H.A. Pass, Christian, MS	5439-57
7	02/21/2013	Jeffers	A.E. Biloxi, MS	8918-45

Count	Date	From	To	Track #
8	02/25/2013	Jeffers	R.H. Bay St. Louis, MS	8836-01
9	02/25/2013	Jeffers	K.F. Jackson, MS	5362-90
10	02/12/2013	Barnard	L.B. Pascagoula, MS	2183-95
11	04/17/2013	Barnard	A.B. Gulfport, MS	9991-62
12	04/17/2013	Barnard	M.D. Moss Point, MS	9801-22

All in violation of Sections 1341 and 2, Title 18, United States Code.

COUNTS 13-18

In furtherance of the scheme and artifice to defraud and to carry out its objectives, the allegations in paragraphs 1-80 are re-alleged and incorporated as if set forth herein

86. That on or about the dates listed in the chart below, in Harrison County in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants, **ANN LOUISE FRANZEN, TANYA LYNN THOMAS and FUNSO HASSAN**, aided and abetted by others known and unknown to the grand jury, intentionally devised and carried out a scheme to defraud and to obtain money and property by means of materially false and fraudulent representations, pretenses and promises, and in furtherance thereof did cause to be transmitted in interstate commerce certain wire communications for the purpose of executing the scheme.

87. On or about the dates set forth below, within the Southern District of Mississippi, and elsewhere, defendants **ANN LOUISE FRANZEN, TANYA LYNN THOMAS and FUNSO HASSAN** for the purpose of carrying out the scheme to defraud and attempting to do so, knowingly caused to be transmitted in interstate commerce, certain wire communications, that is certain money transfers, including but not limited to the proceeds of fraudulent and counterfeit checks, each item constituting a separate count as follows:

Count	Date	From	To	Amount
13	11/01/2012	Franzen	Thomas	\$300.00
14	09/13/2013	Franzen	Hassan	\$850.00
15	09/14/2013	Franzen	Hassan	\$850.00
16	09/15/2013	Franzen	Hassan	\$850.00
17	09/18/2013	Franzen	Hassan	\$900.00
18	09/20/2013	Franzen	Hassan	\$900.00

All in violation of Sections 1343 and 2, Title 18, United States Code.

COUNT 19

88. Paragraphs 1 through 87 of this indictment are re-alleged and incorporated herein by reference.

89. Beginning on or about August 13, 2011, and continuing through June 3, 2015, in the Southern Division of the Southern District of Mississippi and elsewhere, the defendants: **ANN LOUISE FRANZEN, GARY MELVIN BARNARD, SHAWN ANN WHITE, TANYA LYNN THOMAS, MICHELE GAYLE FEE, ANTHONY SHANE JEFFERS and FUNSO HASSAN,** did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

90. To knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of a specified unlawful activity, that is, bank fraud, wire fraud and mail fraud, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of a specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions

represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

102. The manner and means used to accomplish the objectives of the conspiracy included, among others, all of the acts described in paragraphs 1 through 87 of this indictment.

All in violation of Sections 1956(h) and 2, Title 18, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offenses as alleged in this indictment, the defendants shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses.

The grand jury has determined that probable cause exists to believe that the following property is subject to forfeiture as a result of one or more of the offenses alleged in this indictment:

Apple MacBook Pro Laptop, serial number, C1MM97VFDTY3;

Apple iPad, serial number, DLXH21TGDJ8R;

Apple iPhone, serial number, 354405066209290;

Nokia cell phone, serial number, 350998805656684;

Bouygues NANO SIM card, serial number 1714132066116;

Lebaro NANO SIM card, serial number, 66564412U;

Etisalat NANO SIM card, serial number, 8923400008-853953550; and

\$3,120.00 in United States currency.

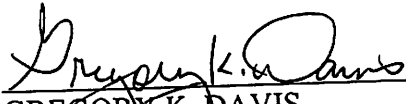
Further, if any property described above, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture

of any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 981(a)(1)(C), Title 18, United States Code, Section 982(a)(1), Title 18, United States Code, and Section 2461, Title 28, United States Code.

A TRUE BILL:

s/signature redacted
Foreperson of the Grand Jury


GREGORY K. DAVIS
United States Attorney

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 22nd day of July, 2015.


UNITED STATES MAGISTRATE JUDGE